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October 29, 2021

VIA ECF

The Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

Quezada v. Prollergy Corporation, Case No. 1:21-cv-04976-JGK

Dear Judge Koeltl:

We represent defendant Prollergy Corporation ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, Jose Quezada, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from October 29, 2021 to December 13, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Maria C. Mannarino Maria C. Mannarino

cc: All counsel of record (by ECF)